



**AIR POLLUTION CONTROL DISTRICT OF JEFFERSON COUNTY, KENTUCKY**  
**TITLE V OPERATING PERMIT**

Permit No. 158-97-TV

Co/Plant ID: 0186

Effective Date: 5 April 2001

Expiration Date: 5 April 2006

UTM Northing: 4232.7

UTM Easting: 605.0

SIC: 3353

NAICS: 331315

AFS:00186

Permission is hereby given by the Air Pollution Control District of Jefferson County to operate equipment located at:

**Reynolds Metals Company Louisville Foil Plant**  
**2827 Hale Avenue**  
**Louisville KY 40211-1260**

in accordance with the permit application on file with the District and under the conditions in the permit. This permit and the authorization to operate the emission units listed shall expire on midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Applicant for Permit: Reynolds Metals Company      Responsible Official: D. Christopher Deptola

Title of Responsible Official: Plant Manager

Date Application Received: 22 April 1997

Date Application Administratively Complete: 20 June 1997

Date Public Notice Given: 10 December 2000

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Reviewing Engineer (60)

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Air Pollution Control Officer

August 29, 2001

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### Abbreviations and Acronyms

AC	- Additional Condition
AFS	- Airs Facility Subsystem
AIRS	- Aerometric Information Retrieval System
APCD	- Air Pollution Control District
ASL	- Adjusted Significant Level
atm	- Atmosphere
BACT	- Best Available Control Technology
Btu	- British Thermal Unit
EC	- Degrees Centigrade
CEMS	- Continuous Emission Monitoring System
CAAA	- Clean Air Act Amendments (15 November 1990)
cf	- Cubic foot
DOE	- District Only Enforceable
EF	- Degrees Fahrenheit
gal	- Gallon
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- hour
lbs	- Pounds
l	- Liter
MACT	- Maximum Achievable Control Technology
m	- Meter
mg	- Milligram
mm	- Millimeter
MM	- Million
MOCS	- Management of Change System
NAICS	- North American Industry Classification System
NSR	- New Source Review
NO <sub>x</sub>	- Nitrogen oxides
NSPS	- New Source Performance Standards
PM	- Particulate Matter
PM <sub>10</sub>	- Particulate matter less than 10 microns
ppm	- Parts per million
PSD	- Prevention of Significant Deterioration
PMP	- Preventive Maintenance Plan
psia	- Pounds per square inch absolute
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO <sub>2</sub>	- Sulfur dioxide
TAL	- Threshold Ambient Limit
TAP	- Toxic Air Pollutant
tpy	- Tons per year
VOC	- Volatile Organic Compound

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0186

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### **Preamble**

Title V of the Clean Air Act Amendments of 1990 required EPA to create an operating permit program for implementation by state or local air permitting authorities. The purposes of this program are (1) to require an affected company to assume full responsibility for demonstrating compliance with applicable regulations; (2) to capture all of the regulatory information pertaining to an affected company in a single document; and (3) to make permits more consistent with each other.

A company is subject to the Title V program if it meets any of several criteria related to the nature or amount of its emissions. The Title V operating permit specifies what the affected company is, how it may operate, what its applicable regulations are, how it will demonstrate compliance, and what is required if compliance is not achieved. In Jefferson County, Kentucky, the Air Pollution Control District (APCDJC) is responsible for issuing Title V permits to affected companies and enforcing local regulations and delegated federal and state regulations. EPA may enforce federal regulations but not "District Only Enforceable Regulations".

Title V offers the public an opportunity to review and comment on a company's draft permit. It is intended to help the public understand the company's compliance responsibility under the Clean Air Act. Additionally, the Title V process provides a mechanism to incorporate new applicable requirements. Such requirements are available to the public for review and comment before they are adopted.

Title V Permit general conditions define requirements which are generally applicable to all Title V companies under the jurisdiction of APCDJC. This avoids repeating these requirements in every section of the company's Title V permit. Company-specific conditions augment the general conditions as necessary; these appear in the sections of the permit addressing individual emission units or emission points.

The general conditions include references to regulatory requirements that may not currently apply to the company, but which provide guidance for potential changes at the company or in the regulations during the life of the permit. Such requirements may become applicable if the company makes certain modifications or a new applicable requirement is adopted.

When the applicability of a section or subpart of a regulation is unclear, a clarifying citation will be made in the company's Title V permit at the emission unit/point level. Comments may also be added at the emission unit/point level to give further clarification or explanation.

The source's Title V permit may include a list of "insignificant activities," which are activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Activities so identified may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply and must be included in the Title V operating permit. No periodic monitoring shall be required for facilities designated as insignificant activities.

### **General Conditions**

1. **Compliance** - The owner or operator shall comply with all applicable requirements and with all terms and conditions of this permit. Any noncompliance shall constitute a violation of the Act, State and District regulations and shall cause the source to be subject to enforcement actions including, but not limited to, the termination, revocation and reissuance, or revision of this permit, or denial of a permit application to renew this permit. Notwithstanding any other provision in the Jefferson County portion of the Kentucky SIP approved by EPA, any credible evidence may be used for the purpose of establishing whether the owner or operator is in compliance with, has violated, or is in violation of any such plan. (Regulation 2.16, sections 4.1.3, 4.1.13.1 and 4.1.13.7)
2. **Compliance Certification** - The owner or operator shall certify, annually or more frequently if required in applicable regulations, compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall meet the requirements of Regulation 2.16, sections 3.5.11 and 4.3.5. The owner or operator shall submit the annual compliance certification directly to the following address as well as to the District, as set forth in Regulation 2.16, section 4.3.5.4:

***US EPA - Region IV  
Air Enforcement Branch  
Atlanta Federal Center  
61 Forsyth Street  
Atlanta, GA 30303-8960***

3. **Compliance Schedule** - A compliance schedule must meet the requirements of Regulation 2.16, section 3.5.9.5. The owner or operator shall submit a schedule of compliance for each emission unit that is not in compliance with all applicable requirements. A schedule of compliance shall be supplemental to, and shall not condone noncompliance with, the applicable requirements on which it is based. For each schedule of compliance, the owner or operator shall submit certified progress reports at least semi-annually, or at a more frequent period if specified in an applicable requirement or by the District in accordance with Regulation 2.16 section 4.3.4. The progress reports shall contain:
  - a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when activities, milestones, or compliance were achieved.
  - b. An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted.
4. **Duty to Supplement or Correct Application** - If the owner or operator fails to submit relevant facts or has submitted incorrect information in the permit application, it shall, upon

discovery of the occurrence, promptly submit the supplementary facts or corrected information in accordance with Regulation 2.16, section 3.4.

5. **Emergency Provision**

- a. An emergency shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emission limitations. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
  - i. An emergency occurred and that the owner or operator can identify the cause of the emergency.
  - ii. The permitted facility was at the time being properly operated.
  - iii. During the period of the emergency the owner or operator expeditiously took all reasonable steps, consistent with safe operating practices, to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.
  - iv. The owner or operator submitted notice meeting the requirements of Regulation 1.07 of the time when emissions limitations were exceeded because of the emergency. This notice must fulfill the requirement of this condition, and must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- b. In an enforcement proceeding, the owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- c. This condition is in addition to any emergency or upset provision contained in an applicable requirement.

(Regulation 2.16, sections 4.7.1 through 4.7.4)

6. **Emission Fees Payment Requirements** - The owner or operator shall pay annual emission fees in accordance with Regulation 2.08. Failure to pay the emissions fees when due shall constitute a violation of District Regulations. Such failure is subject to penalties and an increase in the fee of an additional 5% per month up to a maximum of 25% of the original amount due. In addition, failure to pay emissions fees within 60 days of the due date shall automatically suspend this permit to operate until the fee is paid or a schedule for payment acceptable to the District has been established. (Regulation 2.08, section 1.3)



7. **Emission Offset Requirements** - The owner or operator shall comply with the requirements of Regulation 2.04.
8. **Enforceability Requirements** - Except for the conditions that are specifically designated as “District Only Enforceable Conditions”, all terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by EPA and citizens as specified under the Act. (Regulation 2.16, sections 4.2.1 and 4.2.2)
9. **Enforcement Action Defense**
  - a. It shall not be a defense for the owner or operator in an enforcement action that it would have been necessary for the owner or operator to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
  - b. The owner or operator's failure to halt or reduce activity may be a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operation.

(Regulation 2.16, sections 4.1.13.2 and 4.1.13.3)
10. **Hazardous Air Pollutants and Sources Categories** - The owner or operator shall comply with the applicable requirements of Regulations 5.02 and 5.14.
11. **Information Requests** - The owner or operator shall furnish to the District, within a reasonable time, information requested in writing by the District, to determine whether cause exists for revising, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The owner or operator shall also furnish, upon request, copies of records required to be kept by this permit. (Regulation 2.16, section 4.1.13.6) If information is submitted to the District under a claim of confidentiality, the source shall submit a copy of the confidential information directly to EPA. (Regulation 2.07, section 10.2)
12. **Insignificant Activities** - The owner or operator shall notify the District in a timely manner of any proposed change to an insignificant activity that would require a permit revision. (Regulation 2.16, section 5)
13. **Inspection and Entry** - Upon presentation of credentials and other documents as required by law, the owner or operator shall allow the District or an authorized representative to perform the following during reasonable hours:
  - a. Enter the premises to inspect any emissions-related activity or records required in this permit.

- b. Have access to and copy records required by this permit.
  - c. Inspect facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required by this permit.
  - d. Sample or monitor substances or parameters to assure compliance with this permit or any applicable requirements.  
(Regulation 2.16, section 4.3.2)
14. **Monitoring and Related Record keeping and Reporting Requirements** - The owner or operator shall comply with the requirements of Regulation 2.16, section 4.1.9. The owner or operator shall submit all required monitoring reports at least once every six months, unless more frequent reporting is required by an applicable requirement. The reporting period shall be January 1st through June 30th and July 1st through December 31st of each calendar year. All reports shall be postmarked by the 60th day following the end of each reporting period. If surrogate operating parameters are monitored and recorded in lieu of emission monitoring, then an exceedance of multiple parameters may be deemed a single violation by the District for enforcement purposes.
15. **Off-permit Documents** - Any applicable requirements, including emission limitations, control technology requirements, or work practice standards, contained in an off-permit document cannot be changed without undergoing the permit revision procedures in Regulation 2.16, Section 5. (Regulation 2.16, section 4.1.5)
16. **Operational Flexibility** - The owner or operator may make changes without permit revision in accordance with Regulation 2.16, section 5.8.
17. **Permit Amendments (Administrative)** - This permit can be administratively amended by the District in accordance with Regulation 2.16, sections 2.3 and 5.4.
18. **Permit Application Submittal** - The owner or operator shall submit a timely and complete application for permit renewal or significant revision. If the owner or operator submits a timely and complete application then the owner or operator's failure to have a permit is not a violation until the District takes formal action on this permit application. This protection shall cease to apply if, subsequent to completeness determination, the owner or operator fails to submit, by the deadline specified in writing by the District, additional information required to process the application as required by Regulation 2.16, sections 3 and 5.2.
19. **Permit Duration** - This permit is issued for a fixed term of 5 years, in accordance with Regulation 2.16, section 4.1.8.3.

20. **Permit Renewal, Expiration and Application** - Permit renewal, expiration and application procedural requirements shall be in accordance with Regulation 2.16, sections 4.1.8.2 and 5.3. This permit may only be renewed in accordance with section 5.3.
21. **Permit Revisions** - No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. (Regulation 2.16, section 4.1.16)
22. **Permit Revision Procedures (Minor)** - Except as provided in 40 CFR Part 72, the Acid Rain Program, this permit may be revised in accordance with Regulation 2.16, section 5.5.
23. **Permit Revision Procedures (Significant)** - A source seeking to make a significant permit revision shall meet all the Title V requirements for permit applications, issuance and renewal, in accordance with Regulation 2.16, section 5.7, and all other applicable District Regulations.
24. **Permit Revocation and Termination by the District** - The District may terminate this permit only upon written request of the owner or operator. The District may revoke a permit for cause, in accordance with Regulation 2.16, section 5.11.1.1 through 5.11.1.5. For purposes of Section 5, substantial or unresolved noncompliance includes, but is not limited to:
  - a. Knowingly operating process or air pollution control equipment in a manner not allowed by an applicable requirement or that results in excess emissions of a regulated air pollutant that would endanger the public or the environment.
  - b. Failure or neglect to furnish information, analyses, plans, or specifications required by the District.
  - c. Knowingly making any false statement in any permit application.
  - d. Noncompliance with Regulation 1.07, section 4.2; or
  - e. Noncompliance with KRS Chapter 77.
25. **Permit Shield** - The permit shield shall apply in accordance with Regulation 2.16, section 4.6.1.
26. **Prevention of Significant Deterioration of Air Quality** - The owner or operator shall comply with the requirements of Regulation 2.05.
27. **Property Rights** - This permit shall not convey property rights of any sort or grant exclusive privileges in accordance with Regulation 2.16, section 4.1.13.5.

28. **Public Participation** - Except for modifications qualifying for administrative permit amendments or minor permit revision procedures, all permit proceedings shall meet the requirements of Regulations 2.07, Section 1; and 2.16, sections 5.1.1.2 and 5.5.4.
29. **Reopening For Cause** - This permit shall be reopened and revised by the District in accordance with Regulation 2.16 section 5.9.
30. **Reopening for Cause by EPA** - This permit may be revised, revoked and reissued or terminated for cause by EPA in accordance with Regulation 2.16 section 5.10.
31. **Risk Management Plan (112(r))** - For each process subject to Section 112(r) of the Act, the owner or operator shall comply with 40 CFR Part 68 and Regulation 5.15.
32. **Severability Clause** - The conditions of this permit are severable. Therefore, if any condition of this permit, or the application of any condition of this permit to any specific circumstance, is determined to be invalid, the application of the condition in question to other circumstances, as well as the remainder of this permit's conditions, shall not be affected. (Regulation 2.16, section 4.1.12)
33. **Stack Height Considerations** - The owner or operator shall comply with the requirements of Regulation 2.10.
34. **Startups, Shutdowns, and Malfunctions Requirements** - The owner or operator shall comply with the requirements of Regulation 1.07.
35. **Submittal of Reports, Data, Notifications, and Applications**
  - a. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit as set forth in Regulation 2.16 sections 3.1, 3.4, 3.5, 4.1.13.6, 5.8.5 and 5.11.7 shall be submitted to:

*Air Pollution Control District of Jefferson County  
850 Barret Ave  
Louisville, KY 40204-1745*

- b. Documents which are specifically required to be submitted to EPA as set forth in Regulation 2.16 sections 3.3, and 5.8.5 shall be mailed to EPA at the following address:

*US EPA - Region IV  
APTMD - 12th floor  
Atlanta Federal Center  
61 Forsyth Street*

*Atlanta, GA 30303-3104*

36. **Other Applicable Regulations** - The owner or operator shall comply with all applicable requirements of the following regulations:

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>	
<b>Regulation</b>	<b>Title</b>
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emission Standards and Maintenance Requirements
1.06	Source Self-Monitoring and Reporting
1.07	Emissions During Startups, Shutdowns, Malfunctions, and Emergencies
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.16	Title V Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
5.01	General Provisions (for Hazardous Air Pollutants)
5.03	Potential Hazardous Emissions

FEDERALLY ENFORCEABLE REGULATIONS	
Regulation	Title
6.01	General Provisions (for <i>Existing Affected Facilities</i> )
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (for <i>New Affected Facilities</i> )

DISTRICT ONLY ENFORCEABLE REGULATIONS	
Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Emissions Fees, Permit Fees, Permit Renewal Procedures, and Additional Program Fees
8.03	Commuter Vehicle Testing Requirements

Permit No. 158-97-TV  
0186

Co/Plant ID

**Emission Unit U-1 Description:** Aluminum rolling mills

**Applicable Regulations:**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulations</b>	<b>Subject</b>	<b>Applicable Sections</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4 & 5
2.12	Emissions Trading (Including Banking and Bubble Rules)	1, 2, 3, 4, 5, 6 & 8
6.24	Standard of Performance for Existing Sources Using Organic Materials	1, 2, 3.3, 4 & 5
6.43	Daily Emissions Limits	1, 2, 3, 4 & 17
7.25	Standards of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3, 4, and 5

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.11	Standards of Performance For Existing Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5 & 6
5.14	Hazardous Air Pollutants and Source Categories	1, 2, 3 & 4

**Allowable Emissions:**

<b>Emission Pt</b>	<b>Description</b>	<b>Applicable Regulation(s)</b>	<b>Emission/ Equipment Standard</b>
E1, E2, E3, E4, E5, E7 and E8	Rolling Mills #1, #2, #3, #4, #5, #11 & #23	1.05, sections 1, 2, 3, 4 & 5	N/A
		5.11	See AC # 1.b.
		6.24, sections 1, 2, 3.3, 4 & 5	See AC # 1.a.i.

<b>Emission Pt</b>	<b>Description</b>	<b>Applicable Regulation(s)</b>	<b>Emission/ Equipment Standard</b>
E6	Rolling Mill #6	6.43, sections 1, 2, 3, 4 & 17	See AC # 1.a.iii.
		1.05, sections 1, 2, 3, 4 & 5	N/A
		5.11	See AC # 1.b.
		7.25, sections 1, 2, 3.1, 3.3. 4 & 5	130.39 VOC TPY (BACT) See AC # 1.a.ii
		6.43, sections 1, 2, 3, 4 & 17	See AC # 1.a.iii
E26	Distillation Unit	1.05, sections 1, 2, 3, 4 & 5	N/A
		7.25, sections 1, 2, 3.3, 4 & 5	< 5 TPY VOC See Comment 4

### **Additional Conditions**

1. **Standards** (Regulation 2.16, section 4.1.1)

a. **VOC**

- i. For rolling mills #1, #2, #3, #4, #5, #11 and #23, the owner or operator shall not allow or cause the emissions of VOC to exceed four hundred fifty (450) pounds in any one hour nor three thousand (3000) pounds in any one day from each mill, unless the emissions have been reduced by at least eighty-five percent (85%) by weight. (Regulation 6.24, section 3.3)
- ii. For rolling mill #6, the owner or operator shall not allow or cause the VOC emissions to exceed 130.39 tons per year. (Regulation 7.25, Section 3)
- iii. The owner or operator shall comply with District Regulation 6.43, section 17 which applies to all rolling mills.
- iv. The owner or operator shall not allow or cause the VOC emissions to exceed 1,258 TPY from Emission Units U1 and U2. (Regulation 2.12, section 8.2)

b. **TAP** (Regulation 5.11)



- i. The owner or operator shall not allow or cause the emissions of Toxic Air Pollutants to exceed the ASL value specified in District regulation 5.11, unless modeling or RACT analysis has been performed and approved by the District.
- 2. **Monitoring** (Regulations 2.16, section 4.1.9.1.2 and 1.05, section 4)
  - a. VOC
    - i. In addition to the record keeping requirements specified in AC # 3, the owner or operator shall comply with the following:

For E1, E2, E3, E4, E5, E6, E7, and E8: The rolling mill emission factor for these mills together shall be updated annually based on the prior year's data. At the end of each year annual rolling mill emissions are calculated based on a material balance by subtracting outputs from inputs to the system: inputs minus outputs equal estimated total mill emissions. The calculation for mill 6 shall be done separately, although the method is basically the same. The inputs include rolling oil, hydraulic oils, oil additives, and oil on reroll (incoming metal) and scrubbers oils (mill 6 only). Outputs shall include oil on scrap and finished metal, oil in filter cake, spent oils shipped offsite, and estimated annealing emissions. The rolling mill emission factors shall be calculated annually by dividing the total estimated emissions by the total surface area of the metal rolled in the mills. Two emission factors are developed for these mills, one factor for mill 6 and a second factor for the remaining mills. These emission factor shall be applied to the daily mill production data to calculate daily emissions.
    - ii. The owner or operator shall monitor the absorber (C7) to ensure it is operating properly. The absorber is monitored continuously by a message system. The message system is an automated control program which measures numerous parameters integral to the proper operation of the Mill 6 oil adsorption and recovery unit ("scrubber"). The message system monitors the proper functioning of pumps, motors, vacuum and filtration units, in addition to various fluid levels, temperatures and pressures within the scrubber system. Many of these parameters do not involve operating ranges (e.g. line vacuum pressure is either maintained or not maintained), but all are critical to the overall operation of the scrubber. When a problem is detected, the mill operators are notified immediately by an error message on the computer screen and by a flashing light in the control room. The exact location of the

problem is identified on an electronic schematic in the control room. If the problem cannot be corrected immediately, the mill will automatically shut down at the end of the coil and will not restart until the problem is corrected. In the event of an absorber malfunction, an error message appears on the operator's computer screen and immediate corrective action will be initiated.

b. TAP

The owner or operator shall comply with AC # 3.a. to demonstrate ongoing compliance with District regulation 5.11.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.1.2)

a. VOC

i. The owner or operator shall maintain records of the following information as required by Regulation 6.43:

- 1). Number of working days per month;
- 2). Pounds of rolling coolant used per month;
- 3). Pounds of rolling coolant purchased per month;
- 4). Pounds of rolling coolant reclaimed quarterly, prorated to a monthly basis;
- 5). Calculated total monthly VOC emissions;
- 6). Calculated daily average VOC emissions; and
- 7). For each rolling coolant used, the aromatic content and the percentage of C<sub>12</sub> or higher saturated hydrocarbon compounds.

ii. The owner or operator shall keep daily records of the production rates on rolling mill #6 (emission point E6) to demonstrate compliance with District Regulations 5.11, 7.25 and 1.05.

iii. The owner or operator shall comply with AC # 2.a.i. which requires calculations of daily VOC emissions using daily production data to demonstrate ongoing compliance with District regulation 6.24.

b. TAP

The owner or operator shall comply with AC # 3.a.i. to demonstrate ongoing compliance with District regulation 5.11.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

a. VOC

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for VOC:

- i. For Emission points subject to District Regulation 2.12:
  - 1) Emission Unit ID and Emission point ID numbers;
  - 2) The beginning and ending date of the reporting period; and
  - 3) The monthly and year to date VOC emissions.
- ii. For Emission points subject to District Regulation 6.24:
  - 1) Emission Unit ID and Emission point ID numbers;
  - 2) The beginning and ending date of the reporting period;
  - 3) Identification of all periods of exceedances of the hourly and daily VOC emission standard for each emission point including the quantity of excess emissions; and
  - 4) Description of any corrective action taken for each exceedance.
- iii. For Emission points subject to District Regulation 6.43:
  - 1) Emission unit ID and emission point ID numbers;
  - 2) The beginning and ending date of the reporting period; and
  - 3) Identification of each occurrence where the requirements of AC # 3 were not met.
- iv. For Emission point E6 (Rolling Mill #6) subject to District Regulation 7.25:
  - 1) Emission Unit ID number and Emission point ID number;
  - 2) The beginning and ending date of the reporting period; and
  - 3) The monthly and rolling 12 month total VOC emissions for each calendar month in the reporting period.

b. TAP

There are no compliance monitoring reports required for TAPs.

**Comments**

1. Rolling mill #6 (U1, E6) is considered BACT to demonstrate compliance with District Regulation 7.25.
2. The potential VOC emissions from the operation of the Distillation Unit (U1, E26) cannot exceed the emission standard specified in District Regulation 7.25, therefore, no record keeping, periodic monitoring, or reporting is required.
3. Reynolds has a banking permit on file, permit #224-95-B, for Volatile Organic Compounds (VOCs). This emission reduction credit has been obtained by shutting down Rolling Mills 12, 13, 14, 22, 25, 26, 28, and 30; Laminators 2, 3, 5, and 13; by switching the rolling oil to a linear paraffin; and by discontinuing the use of hexane. The account balance is 1328.17 tons per year (8951.1 pounds per day). This balance includes 628.27 tons per year (4236.7 pounds per day) of pre-1990 credits and 699.90 tons per year of post-1990 credits (the pre-1990 credits are included in the total since these credits were included in the 1990 and the projected 1996 emissions inventories).
4. The District agreed to consider the emissions from rolling mills and trim cyclone as VOC emissions only in correspondence dated January 15, 1985.

Permit No. 158-97-TV  
0186

Co/Plant ID

**Emission Unit U2 Description:** Oven Group

**Applicable Regulations:**

<b>FEDERALLY ENFORCEABLE REGULATION</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4 & 5
2.12	Emissions Trading (Including Banking and Bubble Rules)	1, 2, 3, 4, 5, 6 & 8
6.24	Standard of Performance for Existing Sources Using Organic Materials	1, 2, 3.3, 4 & 5
7.25	Standards of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3.1, 3.2, 4 & 5

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.11	Standards of Performance For Existing Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5 & 6
5.14	Hazardous Air Pollutants and Source Categories	1, 2, 3 & 4

**Allowable Emissions:**

<b>Emission Pt</b>	<b>Description</b>	<b>Applicable Regulation(s)</b>	<b>Emission/ Equipment Standard</b>
E9, E10, E11, E12, E13, E16, E17, E18, and E19	Annealing Oven #1, #2, #3, #4, #5, #21, #22, #24 & #25	1.05, sections 1, 2, 3, 4 & 5	N/A
		5.11	See AC # 1.b.
		6.24, sections 1, 2, 3.3, 4 & 5	See AC # 1.a.i.

<b>Emission Pt</b>	<b>Description</b>	<b>Applicable Regulation(s)</b>	<b>Emission/ Equipment Standard</b>
E20	Annealing Oven #31	1.05, sections 1, 2, 3, 4 & 5	N/A
		5.11	See AC # 1.b.
		7.25, sections 1, 2, 3.1, 3.2, 4 & 5	See AC # 1.a.ii.

### **Additional Conditions**

1. **Standards** (Regulation 2.16, section 4.1.1)

a. VOC

- i. For ovens #1, #2, #3, #4, #5, #21, #22, #24 and #25, the owner or operator shall not allow or cause the emissions of VOC to exceed four hundred fifty (450) pounds in any one hour nor three thousand (3000) pounds in any one day, unless the emissions have been reduced by at least eighty-five percent (85%) by weight. (Regulation 6.24, section 3.3)
- ii. For oven #31, the owner or operator shall not allow or cause the VOC emissions to exceed 5.0 tons per year. (Regulation 7.25, Section 3)
- iii. The owner or operator shall not allow or cause the VOC emissions to exceed 1258 TPY from Emission Units U1 and U2. (Regulation 2.12, section 8.2)

b. TAP (Regulation 5.11)

- i. The owner or operator shall not allow or cause the emissions of Toxic Air Pollutants to exceed the ASL value specified in District regulation 5.11, unless modeling or RACT analysis has been performed and approved by the District.

2. **Monitoring** (Regulations 2.16, section 4.1.9.1.2 and Regulation 1.05, Section 4)

a. VOC

- i. The owner or operator shall comply with the following to demonstrate ongoing compliance the VOC emission limits:

Incoming and finished metal is heated in annealing ovens to achieve the desired properties necessary for rolling aluminum and manufacture of foil. Annealing oven emissions are based on a factor of 2 mg of oil per square foot per side of the metal surface rolled. Assuming that all oil is driven off and emitted during the annealing operation, an emission factor is derived as follows:

$$(2 \text{ sides})(2\text{mg}/\text{ft}^2)(2.205 \text{ lbs}/\text{kg})(\text{kg}/1 \times 10^6 \text{ mg}) = 8.82 \text{ lbs}/\text{MMft}^2 \text{ Annealed}$$

Daily VOC emissions shall be calculated by applying this emission factor to the daily production summary for the ovens.

- b. TAP

The owner or operator shall comply with AC # 3 to demonstrate ongoing compliance with District regulation 5.11.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.1.2)

The owner or operator shall maintain daily records of the production rate for each annealing oven.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

- a. VOC

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for VOC:

- i. For Emission points subject to District Regulation 2.12:
  - 1) Emission Unit ID and Emission point ID numbers;
  - 2) The beginning and ending date of the reporting period; and
  - 3) The monthly and year to date VOC emissions.
- ii. For Emission points subject to District Regulation 6.24:
  - 1) Emission Unit ID number and Emission point ID number;
  - 2) The beginning and ending date of the reporting period;
  - 3) Identification of all periods of exceedances of the hourly and daily VOC emission standard for each emission point including the quantity of excess emissions; and

4) Description of any corrective action taken for each exceedance.

iii. For Emission points subject to District Regulation 7.25:

- 1) Emission Unit ID number and Emission point ID number;
- 2) The beginning and ending date of the reporting period; and
- 3) The monthly and rolling 12 month total VOC emissions for each calendar month in the reporting period.

b. TAPs

There are no compliance monitoring reports required for TAPs.

### **Comments**

1. Reynolds has agreed to less than five TPY limit for Oven #31 (U2, E20), this oven is used when the aluminum is received and does not have significant rolling oil on it so there are minimal VOC emissions.
- 2.. Annealing ovens #1, 2, 3, 4, 5, 21, 22, 24, and 31 are <10 mmBtu/hr natural gas ovens. The products of combustion from natural gas usage are exempt in accordance with District Regulation 2.02, section 2.1.1. Annealing ovens #13, 14, and 25 are electric ovens and thus not combustion sources.



**Emission Unit U3 Description:** Boiler group using only natural gas as fuel

**Applicable Regulations:**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
6.07	Standards of Performance for Existing Indirect Heat Exchangers	1, 2, 3.1, 3.2, 3.3.1 and 4

**Allowable Emissions:**

<b>Emission Pt</b>	<b>Description</b>	<b>Applicable Regulation</b>	<b>Emission Limit/Standard</b>
E21-E24	4 Boilers	6.07	Opacity - 20%
			PM - 0.34 lb/MM Btu heat input
			SO <sub>2</sub> - 1.0 lb/MM Btu heat input

**Components:**

<b>Emission Pt</b>	<b>Description</b>	<b>Control ID</b>
E21	14.24 MM Btu/hr, installed in 1928	N/A
E22	34.087 MM Btu/hr, installed in 1931	
E23	15 MM Btu/hr, installed in 1954	
E24	15 MM Btu/hr, installed in 1954	

**Control Devices:** There are no control devices associated with this emission unit.

**Additional Conditions**

1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. PM (Regulation 6.07, Section 3.1)

The owner or operator shall not allow or cause the PM emissions to exceed the allowable emission rate specified in this permit as determined pursuant to section 3.1 of Regulation 6.07.

b. Opacity (Regulation 6.07, section 3.2)

The owner or operator shall not allow the opacity to exceed 20% except:

Emissions into the open air of particulate matter from any indirect heat exchanger during building a new fire, cleaning a fire box, or blowing soot for a period or periods aggregating not more than ten minutes in any 60 minutes which are less than 40% opacity.

c. SO<sub>2</sub> (Regulation 6.07, section 4)

- i. No owner or operator of an affected facility shall cause to be discharged into the atmosphere from that affected facility any gases which contain sulfur dioxide in excess of that specified below:
- ii. For sources which have a total heat input capacity 100 million BTU per hour or less, the standard is 1.0 pound per million BTU actual heat input for combustion of liquid and gaseous fuels as determined by section 4.1 of Regulation 6.07.

2. **Monitoring** (Regulation 2.16, sections 4.1.9.1.2.)

a. PM/SO<sub>2</sub>

The potential uncontrolled PM and SO<sub>2</sub> emissions are below the emission standards specified in this permit using AP-42 emission factors; therefore, no ongoing compliance monitoring is required except for monthly fuel usage.

b. Opacity

- i. To demonstrate compliance with the opacity standard, the owner or operator shall conduct monthly one-minute visible emissions survey during normal operation and daylight hours. This condition applies to E-22 only.
- ii. If, at any time, visible emissions are observed, the owner or operator shall initiate corrective action within 8 hours of the initial observation. If the visible emissions persist, the owner or operator shall perform a Method 9 within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07 and take all practicable steps to eliminate the exceedance. Any Method 9 test performed shall meet the requirements of 40 CFR Part 60, Appendix A. Subsequent visible emission surveys shall be conducted as specified in 2.bi

- iii. If an emission point is not being operated during the observation period, then no visible emission survey needs to be performed and a negative declaration may be entered in the record. The owner or operator shall maintain sufficient records to verify the emission point was not being operated.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. PM/SO<sub>2</sub>

The owner or operator shall maintain monthly records of the following information:

- i. The quantity of natural gas burned in all boilers for each operating month.

b. Opacity

The owner or operator shall maintain records of the results of all visible emission surveys and tests. The visible emission survey records shall include the date and time of the survey, the name of the person conducting the survey, and whether or not visible emissions were observed. Any correction actions resulting from 2.b.ii. above shall be documented and records made available to the District upon request.

4. **Reporting** (Regulation 2.16, Section 4.1.9.3)

a. PM

The potential uncontrolled emissions of PM do not exceed the allowable emission limit; therefore, no compliance monitoring reports are required.

b. SO<sub>2</sub>

The potential uncontrolled SO<sub>2</sub> emissions of do not exceed the allowable emission limit; therefore, no compliance monitoring reports are required.

c. Opacity

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for opacity:

- i. Emission Unit ID number;
- ii. The beginning and ending date of the reporting period;
- iii. The date, time and results of each visible emissions survey conducted

that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit

a negative declaration;

- iv. The date, time and results of each Method 9. If no Method 9 tests were performed during the reporting period, the owner or operator may submit a negative declaration; and
- v. Description of any corrective action taken pursuant to AC # 2.b.ii.

### **Comment**

The Company is burning the natural gas only. This emission unit can not exceed the PM or SO<sub>2</sub> emission limits for any of the natural gas fired boilers listed above based on AP-42 emission factors; therefore, no additional record keeping, monitoring, or reporting is required, except as specified above.

**Emission Unit U4 Description:** Five (5) Non-halogenated Metal Parts Cold Solvent Cleaners

**Applicable Regulations:**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4 & 5
6.18	Standards of Performance for Existing Solvent Metal Cleaning Equipment	1, 2, 3 & 4
7.18	Standards of Performing For New Solvent Metal Cleaning Equipment	1, 2, 3 & 4

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.14	Hazardous Air Pollutants and Source Categories	1, 2, 3, & 4
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5, & 6
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants.	1, 2, 3, 4, & 5

**Allowable Emissions:**

<b>Emission Point</b>	<b>Description</b>	<b>Applicable Regulation</b>	<b>Limit/Standard</b>
E27 - E30	4 Parts Cleaners	5.11 and 6.18	See AC # 1.a. and 1.b.
E31	1 Parts Cleaner	5.12 and 7.18	See AC # 1.a. and 1.b.

**Components:**

<b>Emission Pt</b>	<b>Description</b>
E27	1 cold solvent cleaner designated as Solvent Cleaner # 1
E28	1 cold solvent cleaners designated as Solvent Cleaner # 2
E29	1 cold solvent cleaners designated as Solvent Cleaner # 3

Emission Pt	Description
E30	1 cold solvent cleaners designated as Solvent Cleaner # 4
E31	1 cold solvent cleaners designated as Solvent Cleaner # 5

### Additional Conditions

1. **Standards** (Regulation 2.16, section 4.1.1)

a. VOC (Regulation 7.18, Sections 3 and 4)

i. Control equipment

- 1) The cleaner shall be equipped with a cover.
- 2) The cleaner shall be equipped with a drainage facility such that VOC that drains off parts removed from the cleaner will return to the cleaner. The drainage facility may be external if the District determines that an internal type cannot fit into the cleaning system.
- 3) A permanent, conspicuous label summarizing the operating requirements in AC # 1.ii. shall be installed on or near the cleaner.
- 4) If used, the VOC spray shall be a fluid stream, not a fine, atomized, or shower type spray, at a pressure that does not cause excessive splashing.
- 5) If the VOC is heated above 120°F, then one of the following control devices shall be used:
  - A. Freeboard that gives a freeboard ratio equal to or greater than 0.7,
  - B. Water cover (VOC must be insoluble in and heavier than water), or
  - C. Other systems of equivalent control, such as a refrigerated chiller or carbon absorption.

ii. Operating Requirements

- 1) Do not dispose of waste VOC or transfer it to another party in a manner that more than 20% by weight of the waste VOC can evaporate into the atmosphere. Store waste VOC only in covered containers.
- 2) Close degreaser cover whenever not handling a part in the cleaner.
- 3) Drain cleaned parts until dripping ceases (15 seconds is usually necessary).

- 4) Do not operate a cold cleaning degreaser with a solvent vapor pressure that exceeds 1.0 mm Hg (0.019 psi) measured at 20EC (68EF).

b. TAPs (Regulations 5.11 and 5.12)

The owner or operator shall not allow or cause the emissions of TAP's to exceed the ASL value, unless modeling or a RACT/BACT analysis has been submitted and approved by the District.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. VOC

- i. The owner or operator shall conduct monthly inspections to verify ongoing compliance with the control and operational requirements specified in AC # 1.a.i. and 1.a.ii.

b. TAP

Compliance monitoring for the TAP emission standards shall be the record keeping requirement in AC # 3.b.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. VOC

- i. The owner or operator shall maintain records that include the following for each purchase:

- 1) The name and address of the solvent supplier,
- 2) The date of the purchase,
- 3) The type of the solvent, and
- 4) The vapor pressure of the solvent measured in mm Hg at 20EC (68EF).

- ii. The owner or operator shall maintain records of the results of the inspection requirement specified in AC # 2.a.i.

b. TAP

The owner or operator shall maintain monthly records of the quantity of each solvent used including the weight % of each TAP.

4. **Reporting**

a. VOC/TAP

There are no compliance monitoring reports required for these pollutants.



**Emission Unit U5 Description:** Degreasing Process

**Applicable Regulations:**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4 & 5
6.24	Standard of Performance for Existing Sources Using Organic Materials; sections 1, 2, 3.2, 4 & 5	1, 2, 3.2, 4 & 5

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.11	Standards of Performance For Existing Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5 & 6
5.14	Hazardous Air Pollutants and Source Categories	1, 2, 3 & 4

**Allowable Emissions:**

<b>Emission Point</b>	<b>Description</b>	<b>Applicable Regulations</b>	<b>Emission Limit/Standard</b>
E32	Degreasing	6.24	VOC - 8 lbs/hr and 40 lbs/day
		5.11	Trichloroethylene - See AC # 1.a.ii.
			Misc TAPs - < ASL

**Components:**

<b>Emission Pt</b>	<b>Description</b>	<b>Control ID</b>
E32	Spray cans of products containing trichloroethylene are used to degrease or lubricate various pieces of equipment	N/A

**Control Devices:** There are no control devices associated with this Emission Unit.

### **Additional Conditions**

1. **Standards** (Regulation 2.16, section 4.1.1)

a. VOC

- i. The owner or operator shall not allow or cause the VOC emissions to exceed eight (8) pounds in any one hour and forty (40) pounds in any one day, unless the emissions have been reduced by at least eighty-five percent (85%) by weight. (Regulation 6.24, section 3.2)
- ii. The owner or operator shall not use more than 700 (19 ounce) cans of trichloroethylene per month in accordance with Reynold's correspondence dated February 15, 1999.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. VOC

The owner or operator shall maintain monthly records of product usage to verify that usage does not exceed 700 cans/month. Calculations are as follows:

Assumptions:

- C Usage Records Based on Cans Dispensed from Stock Room
- C Using "worst case" product: Heavy Duty Degreaser (Stock No. 32-70-6511)
- < 19 Ounce Maximum Can Size
- < 95% Maximum Trichloroethylene
- < 700 Cans per Month

Permit Limits:

- C VOC Emissions Limits: 8 lb/hr; 40 lb/day

Maximum Potential Monthly Emissions:

$$\begin{aligned} &= (700 \text{ Cans/month})(19 \text{ ounces/Can})(95\% \text{ trichloroethylene})(1 \text{ lb}/16 \text{ ounces}) \\ &= 790 \text{ pounds trichloroethylene per month} \end{aligned}$$

or

$$\text{Average of } 39.5 \text{ pounds/day (based on 20 days)}(1 \text{ day}/24 \text{ hours}) = 1.645 \text{ lb/hr}$$

4. **Reporting** (Regulation 2.16, Section 4.1.9.3)

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports:

- 1) Emission Unit ID number and Emission point ID number;
- 2) The beginning and ending date of the reporting period;
- 3) Identification of all periods of exceedances of the limit on monthly can usage or emissions limit, including the quantity of excess emissions; and
- 4) Description of any corrective action taken for each exceedance.

**Emission Unit U6 Description:** Core Paper Cyclone used to transfer waste core paper scrap from the slitters to a baler.

**Applicable Regulation:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.09	Standards of Performance for Existing Process Operations	1, 2, 3, & 5

**Allowable Emissions:**

Emission Pt	Description	Applicable Regulation	Limit/Standard
E33	Cyclone	6.09	Opacity < 20%
			PM - 2.58 lbs/hr

**Components:**

Emission Pt	Description
E27	Core paper cyclone, 6840 cfm, used to transfer waste, core paper scrap from the slitters to the bailer, vented out stack S35

**Control Devices:** There are no control devices associated with emission unit U6.

**Additional Conditions**

1. **Standards** (Regulation 2.16, section 4.1.1)

a. PM (Regulation 6.09, Section 3.2)

The owner or operator shall not allow or cause the PM emissions to exceed the allowable emission rate specified in this permit as determined pursuant to Section 3.2 of Regulation 6.09.

b. Opacity (Regulation 6.09, section 3.3.1)

The owner or operator shall not allow or cause the opacity from this emission unit to exceed 20%.

2. **Monitoring** (Regulation 2.16, sections 4.1.9.1.2.)

a. PM

The potential uncontrolled PM emissions are below the emission standard specified in this permit; therefore, no ongoing compliance monitoring is required.

b. Opacity

- i. To demonstrate compliance with the opacity standard, the owner or operator shall conduct a weekly one-minute visible emissions survey, during normal operation and daylight hours, of the PM emission point identified as E-27. No more than four Emission Points shall be observed simultaneously.
- ii. For Emission Points without observed visible emissions during twelve consecutive operating weeks, the owner or operator may elect to conduct a monthly one-minute visible emission survey, during normal operation and daylight hours. No more than four Emission Points shall be observed simultaneously.
- iii. At Emission Points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 for stack emissions or Method 22 for fugitive emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07, and take all practicable steps to eliminate the exceedance. Subsequent visible emission surveys shall be conducted as indicated in 2.a.
- iv. No visible emission survey needs to be performed if an Emission Unit is not being operated during a given day, week or month (as appropriate).

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. PM

The potential uncontrolled emissions of PM do not exceed the allowable emission limit; therefore, no compliance record keeping are required.

b. Opacity

The owner or operator shall maintain records of the results of all visible emission surveys and tests. The visible emission survey records shall include the date and time of the survey, the name of the person conducting the survey, and whether or not visible emissions were observed. Any correction actions resulting from 2. b. ii. above shall be documented and records made available to the District upon request.

4. **Reporting** (Regulation 2.16, Section 4.1.9.3)

a. PM

The potential uncontrolled emissions of PM do not exceed the allowable emission limit; therefore, no compliance monitoring reports are required.

b. Opacity

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for opacity:

- i. Emission Unit ID number;
- ii. The beginning and ending date of the reporting period;
- iii. The date, time and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration;
- iv. The date, time and results of each Method 9. If no Method 9 tests were performed during the reporting period, the owner or operator may submit a negative declaration; and
- v. Description of any corrective action taken pursuant to AC # 2.b.iii.

**Emission Unit U7 Description:** VOC Storage Tanks

**Applicable Regulation:**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
40 CFR 60 Subpart K <sub>b</sub>	Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	60.110b (a & c), 60.111b, & 60.116b (a & b)

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.12	Standards of Performance For New Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, & 5
5.14	Hazardous Air Pollutants and Source Categories	1, 2, 3 & 4
7.02	Federal New Source Performance Standards Incorporated by Reference	1.23

**Allowable Emissions:**

<b>Emission Pt</b>	<b>Description</b>	<b>Applicable Regulation</b>	<b>Limit/Standard</b>
E34-37	Storage Tanks	40 CFR Part 60, Subpart K <sub>b</sub>	See AC # 1.a.
		5.12	See AC # 1.b.

**Components:**

<b>Emission Pt</b>	<b>Description</b>
E34-37	Four 20,080 gallon tanks for storing rolling oil

**Control Devices:** There are no control devices associated with emission unit U7.

**Additional Conditions**

1. **Standards** (Regulation 2.16, section 4.1.1)

a. VOC

This emission unit is not subject to any emission or equipment standard for VOC due to the capacity of the storage tanks and vapor pressure of the material stored.

b. TAP

The owner or operator shall not allow or cause the emissions of Toxic Air Pollutants to exceed the ASL value specified in District regulation 5.12, unless modeling or BACT analysis has been performed and approved by the District.

2. **Monitoring** (Regulation 2.16, sections 4.1.9.1.2.)

a. VOC/TAP

This emission unit is not subject to any monitoring requirements. (See Comment 1)

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. VOC

The owner or operator shall maintain the following records as required by 60.116b(b) of 40 CFR 60, Subpart K<sub>b</sub>.

Records showing the dimension of emission points E-34 through E-37 and an analysis showing the capacity of each tank. This emission unit is not subject to any other provisions of Subpart K<sub>b</sub>. These records shall be kept for the life of the storage tank.

b. TAP

This emission unit is not subject to any record keeping requirements for TAPs. (See Comment 1)

4. **Reporting** (Regulation 2.16, Section 4.1.9.3)

a. VOC/TAP



This emission unit is not subject to any compliance reporting requirements.

**Comments**

1. The potential uncontrolled emissions of TAPs from this emission unit are below the ASL values; therefore, no compliance monitoring is required.

### Permit Shield

The owner or operator is hereby granted a permit shield that shall apply as long as the owner or operator demonstrates ongoing compliance with all conditions of this permit. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements of the regulations cited in this permit as of the date of issuance, pursuant to Regulation 2.16, section 4.6.1.

### Alternative Operating Scenarios

The owner or operator did not request to operate under any alternative operating scenarios in its Title V permit application.

### Off Permit Documents

There are no Off-Permit documents associated with the issuance of this operating permit.

Insignificant Activities		
Description	Quantity	Basis
VOC Storage Tank, less than 250 gallon	Various	Regulation 2.02, section 2.3.24
Storage Tank, fuel or lubricating oils, vapor pressure < 10 mmHg at 20°C and 760 mm of Hg	12	Regulation 2.02, section 2.3.9.2
Combustion Sources < 10 MMBtu/hr	4	Regulation 2.02, section 2.1.1
Storage tanks - Diesel fuel - Not for sale, resale or distribution - annual turnover < 2x capacity	1	Regulation 2.02, section 2.3.25
Woodworking, except for conveying, hogging or burning wood/sawdust	various	Regulation 2.02, section 2.3.5
Indoor PM collectors venting indoors - Non 5.11, 5.12 or 5.14 regulated material	various	Regulation 2.02, section 2.3.21
Lab Ventilating & Exhausting Systems, non-radioactive materials	various	Regulation 2.02, section 2.3.11
Emergency Relief Vents or Ventilating Systems	various	Regulation 2.02, section 2.3.10
Brazing, Soldering or Welding Equipment	various	Regulation 2.02, section 2.3.4
Internal Combustion Engines, Fixed or Mobile	various	Regulation 2.02, section 2.2

Insignificant Activities		
Description	Quantity	Basis
Research & Development (R&D) Activities, potential emissions less than 5 tons per year	1	Regulation 2.02, section 2.3.27
Dry trim cyclones	2	Regulations 1.02, section 1 and 2.02, section 2.3

1. Insignificant Activities are only those activities or processes falling into the general categories defined in District Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.
2. Activities identified In District Regulation 2.02, Section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the Title V permit.
  - a. No facility, having been designated as an insignificant activity, shall be exempt from any generally applicable requirement which shall include a 20% opacity limit for facilities not otherwise regulated.
  - b. No periodic monitoring shall be required for facilities designated as insignificant activities.

\*Note: The separator trim cyclone carries trim that is approximately ½" wide x 3" long to a main collection point. This trim material does not meet the definition of particulate matter per District Regulation 1.02, and is therefore not a regulated pollutant.